

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

No. 13-53846

Chapter 9

HON. STEVEN W. RHODES

**STATE OF MICHIGAN'S SUPPLEMENTAL RESPONSE  
TO RETIREES' COMMITTEE SUBPOENA DUCES TECUM  
(DKT. #4034)**

The State of Michigan provides the following supplemental response to the Official Committee of Retirees Subpoena Duces Tecum:

1. On May 16, 2014, the State personally served on counsel for the subpoena parties, its electronic discovery produced in response to the Official Committee of Retirees' Subpeona Duces Tecum (DKT. #4034). This consisted of a CD-rom containing a searchable electronic version of certain responsive documents and "slip pages" identifying documents that were withheld because of privilege, confidentiality or because they were non-responsive.

Certain documents in that electronic production were identified as withheld without explanation; one document was incorrectly withheld.

The enclosed CD-rom entitled “State of Michigan/Office of Attorney General City of Detroit Bankruptcy II MICH000000001- MICH00003111 May 19, 2014” is a supplemental version of the State’s electronic discovery that corrects and properly identifies those documents withheld without explanation and producing the one document that was incorrectly withheld. The Production Bates # represents the page on which the corrected explanation is found and the number for the production document:

Production Bates #	Explanation
MICH00000304	withheld as non-responsive
MICH00000305	withheld as non-responsive
MCH00000348	withheld as privileged – See Priv-001354
MICH00000351	withheld as non-responsive
MICH00000352	withheld as non-responsive
MICH 00000353	withheld as privileged – See Priv-001355
MICH00000763	withheld as non-responsive
MICH00000865	withheld as non-responsive
MICH00000868	withheld as non-responsive
MICH00000876	withheld as non-responsive

MICH00000877	withheld as non-responsive
MICH00000878	withheld as non-responsive
MICH00000879	withheld as non-responsive
MICH00001798	withheld as non-responsive
MICH00001831	withheld as non-responsive
MICH00003050	incorrectly withheld – Provided
MICH00003069	withheld as non-responsive
MICH00003070	withheld as non-responsive

2. The State of Michigan's Privilege Log is included with this Corrected and Supplemental Response.

Dated: May 19, 2014

/s/ Matthew Schneider  
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